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**Attorneys for Plaintiffs**

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
(San Francisco Division)

SOLANO & NAPA COUNTIES  
ELECTRICAL WORKERS HEALTH AND  
WELFARE TRUST FUND; et al.,

Plaintiffs,

vs.

CAMERON ELECTRIC & LIGHTING  
DESIGN, a sole proprietorship; ZACHARY  
ALAN CAMERON, its owner;  
CAMERSON ELECTRIC dba CAMERON  
ELECTRIC & LIGHTING DESIGN,

Defendants.

Case No. C-07-04111 VRW

**NOTICE OF MOTION FOR DEFAULT  
JUDGMENT AGAINST DEFENDANTS  
CAMERON ELECTRIC & LIGHTING  
DESIGN AND ZACHARY ALAN  
CAMERON**

[F.R.C.P. Rule 55(a)]

Date: April 10, 2008  
Time: 2:30 p.m.  
Courtroom: 6, 17<sup>th</sup> Floor  
Location: 450 Golden Gate Avenue  
San Francisco, CA 94102  
Judge: Chief Judge Vaughn R. Walker

PLEASE TAKE NOTICE that on Thursday, April 10, 2008 at 2:30 p.m., or as soon thereafter as this matter may be heard before U.S. District Court Chief Judge Vaughn R. Walker, in Courtroom 6 on the 17th Floor at the U.S. District Courthouse, 450 Golden Gate Avenue located in San Francisco, California 94102, Plaintiffs SOLANO & NAPA COUNTIES ELECTRICAL WORKERS HEALTH & WELFARE TRUST FUND; SOLANO & NAPA COUNTIES ELECTRICAL WORKERS LABOR & MANAGEMENT COMMITTEE: I.B.E.W. LOCAL 180 JOINT APPRENTICESHIP TRAINING TRUST FUND; SOLANO AND NAPA COUNTIES ELECTRICAL WORKERS PENSION TRUST FUND; SOLANO & NAPA COUNTIES ELECTRICAL WORKERS PROFIT SHARING PLAN; LOCAL 180 of the INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO; and, DAN BROADWATER, as Trustee of the Plaintiff Trusts, Co-chair of the Committee, and Business Manager/Financial Secretary of I.B.E.W. Local 180 (hereinafter collectively referred to as the "Plaintiffs", "Trusts" or "Funds") will move this court for default judgment against Defendants CAMERON ELECTRIC & LIGHTING DESIGN, a sole proprietorship; ZACHARY ALAN CAMERON, its owner; and, CAMERON ELECTRIC dba CAMERON ELECTRIC & LIGHTING DESIGN in the amount of \$68,807.74.


The motion is supported by the Points and Authorities filed herewith, the Declarations of Mark H. Lipton and Scott M. De Nardo filed herewith and the entire file in this action. Default against Defendants CAMERON ELECTRIC & LIGHTING DESIGN and ZACHARY ALAN CAMERON was entered on September 28, 2007.

Judgment is sought against Defendants CAMERON ELECTRIC & LIGHTING DESIGN and ZACHARY ALAN CAMERON, joint and several, pursuant to a collective bargaining agreement and 29 U.S.C. § 1132(g) in the amount of \$68,807.74.

1 Dated: February 19, 2008

Respectfully submitted,

2 NEYHART, ANDERSON,  
3 FLYNN & GROSOLL

4 By:   
5 Scott M. De Nardo  
6 Attorneys for Plaintiffs  
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28 NEYHART,  
ANDERSON,  
FLYNN &  
GROSOLL  
ATTORNEYS AT LAW

PROOF OF SERVICE BY MAIL

I, the undersigned, declare:

I am employed in the City and County of San Francisco, State of California. I am over the age of 18 years and not a party to the within action; my business address is 44 Montgomery Street, Suite 2080, San Francisco, California 94104. On February 19, 2008, I served the within:

**NOTICE OF MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS  
CAMERON ELECTRIC & LIGHTING DESIGN AND ZACHARY ALAN CAMERON**

on the parties in said cause following our business practice, with which I am readily familiar. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I placed a true copy of the within document enclosed in a sealed envelope with first class postage thereon fully prepaid for collection and deposit on the date shown below in the United States mail at San Francisco, California addressed as follows:

CAMERON ELECTRIC & LIGHTING DESIGN  
2412 3<sup>rd</sup> Street  
Napa, CA 94559

ZACHARY ALAN CAMERON  
2412 3<sup>rd</sup> Street  
Napa, CA 94559

CAMERON ELECTRIC dba CAMERON ELECTRIC & LIGHTING DESIGN  
2412 3<sup>rd</sup> Street  
Napa, CA 94559

I declare under the penalty of perjury that the foregoing is true and correct, and that this declaration was executed on February 19, 2008, at San Francisco, California.

  
Judy Dunworth